

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

T-MOBILE USA, INC. *et al*,

*Defendants.*

Case No. 2:23-CV-00379-JRG-RSP

(Lead Case)

**JURY TRIAL DEMANDED**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

T-MOBILE USA, INC. *et al*,

*Defendants.*

Case No. 2:23-CV-00377-JRG-RSP

(Member Case)

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR ENTRY OF SUPPLEMENTAL PROTECTIVE ORDER**

Plaintiff Headwater Research LLC (“Headwater”) respectfully moves for the Court to enter the Supplemental Protective Order attached as Exhibit A. Defendants do not oppose.

The Court previously entered a Protective Order to protect party and non-party confidential business information in the above-referenced action on January 2, 2024 (Dkt. No. 45) (“Protective Order”).

Apple Inc. (“Apple”), a non-party to this action, intends to produce confidential source code and other documents in this action that include or incorporate confidential business information (“CBI”) belonging to Apple. The Parties and Apple have agreed to provisions in

addition to those contained in the Protective Order to protect such Apple CBI.

Therefore, Headwater respectfully requests that the Court enter the Supplemental Protective Order attached as Exhibit A.

Dated: November 5, 2024

Respectfully submitted,

/s/ Marc Fenster

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**ATTORNEYS FOR PLAINTIFF,  
Headwater Research LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2024, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via CM/ECF.

/s/ Kristopher Davis  
Kristopher Davis

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that on November 5, 2024, counsel for all parties met and conferred in accordance with L.R. CV-7(h). This motion is unopposed.

/s/ Kristopher Davis  
Kristopher Davis